

Federal Regulatory Affairs

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August 22, 2012

Marlene H. Dortch Secretary Federal Communications Commission 445 12th St., S.W. Washington, D.C. 20554

Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Dear Ms. Dortch:

As described in Frontier's August 17, 2012, ex parte letter in this docket, ¹ Frontier writes to supplement its Broadband Adoption Lifeline Pilot Program application. ²

Specifically, Frontier is responding to the following FCC staff questions about our application:

1) How would Frontier's proposed project service area be divided to provide for control and test groups?

Subscribers may choose from three offers within our pilot. The first is a \$25 monthly recurring discount only with no participation in a digital literacy program. The second involves participation in a digital literacy program and receiving a \$35 monthly recurring discount and a waiver of the \$34.99 non-recurring charge. The third, and final, choice involves participation in a digital literacy program, receiving a \$25 monthly recurring discount and a free desktop computer.

For participation in the second or third choice, there will be a test market and a control market. Customers in the test market will need to attend and complete the digital literacy training in order to receive the additional incentives. Customers in the control market will also be encouraged to take the training, however these customers will receive no incentives for doing so.

The test market will consist of the following geographic areas:

- Eastern Ohio
 - Stark, Columbiana, Carroll, Jefferson, Holmes, Tuscarawas, Coshocton, Harrison, Belmont, Guernsey, Noble, and Washington counties

¹ See Letter from Michael D. Saperstein, Jr., Frontier, to Marlene H. Dortch, FCC, WC Dkt. No. 11-42 (filed Aug. 17, 2012).

² See Letter from Michael D. Saperstein, Jr., Frontier, to Marlene H. Dortch, FCC, WC Dkt. No. 11-42 (filed Jul. 2, 2012).

- Southern Ohio
 - Pike, Scioto, Lawrence, Jackson, Meigs, Vinton, Athens, and Morgan counties
- North Central Ohio
 - Crawford, Seneca, Sandusky, Ottawa, Erie, Huron, Richland, and Ashland counties
- Southwest Ohio (Miami, Montgomery, Preble, Butler, Clinton, Highland, Ross, Fayette, Brown, Adams, and Clermont counties)

The control market will consist of the following geographic areas:

- Northwest Ohio
 - Lucas, Wood, Hancock, Fulton, Williams, Defiance, Hardin, Paulding, Van Wert, Allen, Mercer, Auglaize, Darke, and Shelby counties
- Northeast Ohio
 - o Lorain, Medina, Wayne, Summit, and Portage counties
- Central Ohio
 - Hocking, Perry, Pickaway, Fairfield, Clark, Champaign, Union, Delaware, Morrow, Marion, Hardin, and Wyandot counties
- Parkersburg WV
 - o Calhoun, Jackson, Mason, Pleasants, Ritchie, Roane, Wirt and Wood counties

The designation of test and control markets does change Frontier's financial projections as to which credits and incentives we expect participants to choose. Accordingly, Frontier expects that the project funding would be distributed as follows:

Estimated total trial participants: 1500

# of Months	Participants	Cost
12	937	\$281,100.00
12	375	\$157,500.00
1	375	\$13,121.25
12	188	\$56,400.00*
	1500	\$508,121.25
	12 12 1	12 937 12 375 1 375 12 188

^{*}Cost of computer will be covered by Frontier.

2) Provide information on whether Frontier proposes to self-collect or have USAC collect participants' information.

Frontier's call center will handle a standardized data collection. Initial questions will be asked via a Pilot Program Certification Form (attached as Appendix A) and potential eligible subscribers will be notified of the requirement to answer the standardized questions. At the end of the program, customers will be required to complete a Pilot Program Completion Form (attached as Appendix B).

3) What are Frontier's available speed tiers in the testing regions and what is the availability of such tiers?

Frontier's currently offers four tiers of offerings with speeds of up to:

- 1 Mbps download/384Kbps upload
- 6 Mbps download/1 Mbps upload
- 12 Mbps download/2 Mbps upload
- 25 Mbps download/2 Mbps upload

The following percentages of sites in the proposed service area can support those speed tiers:

6M up to 12M	16.8%
3M up to 6M	41.4%
1M up to 3M	94.2%
<1M	100%

4) Provide a description of how participants would interact with the digital literacy program.

While the *Every Citizen Online* program offers both online and in-person training, Frontier expects that the majority of participants will utilize the in-person training option. As part of its proposal (see below) Frontier is offering computer equipment to program participants that take digital-literacy training, but the completing the training is a prerequisite for receiving the computer. Accordingly, in-person training will be particularly important for program participants that lack in-home access to a computer.

5) Provide information on how participants would receive computer equipment through their participation in the program.

Every Citizen Online program participants will be made aware of the offer for computer equipment in two ways. When the participant completes digital literacy training, that participant will receive a certificate and will also come to a screen that makes clear the offer for the free computer through Frontier's program. Frontier will also conduct its own outreach to those that have completed the digital literacy training to ensure they are aware of the equipment offer.

Frontier appreciates the opportunity to share this information with the Commission regarding its Application. Please feel free to contact me with any further questions.

Sincerely,
Michael Supert

Michael D. Saperstein, Jr. Director of Federal Regulatory Affairs

Frontier Communications

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cc:

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